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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
(Portland Division)

**ADI ACQUISITION CO., LLC,**  
Plaintiff,  
  
v.  
  
**THEODORE L. VALLAS,**  
Defendant.

Civil No. 3:18-cv-01871-HZ

**DECLARATION OF AVA L.  
SCHOEN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
ATTORNEYS' FEES**

I, Ava L. Schoen, do hereby declare as follows:

1. I am the attorney of record for Plaintiff in this action. I have personal knowledge of all of the facts herein and am competent to testify thereto.
2. I am submitting this declaration in support of Plaintiff's motion for attorneys' fees and costs. I am familiar with the work performed and services rendered in connection with this case.

3. I have reviewed the fees and costs Plaintiff has been charged by Tonkon Torp. Based on my review, Plaintiff has been charged \$107,880 in fees and \$2,148.50 in costs for the litigation for the period of January 1, 2020 through June 30, 2020.

4. Plaintiff's costs, disbursements, and fees are allowable based on Defendant's Personal Guaranty executed on March 20, 2018, in favor of Plaintiff (the "Guaranty"). The amount of fees incurred from January 1, 2020 through June 30, 2020 is \$107,880, as detailed on **Exhibit 1**. The amount of costs incurred from January 1, 2020 through June 30, 2020 is \$2,148.50, as detailed in **Exhibit 2**.

5. According to the 2017 Oregon State Bar Economic Survey, the average (mean) hourly billing rate for business and corporate litigation attorneys practicing in Portland, Oregon was \$367 per hour in 2016.

6. The 2017 Oregon State Bar Economic Survey reports rates from 2016. A method of adjusting for inflation the 2016 rates listed in the survey to produce an estimate of the corresponding rates prevalent in the Portland-area legal community in 2020, is to multiply the 2016 rates by the federal Bureau of Labor Statistics' reported consumer price index for urban consumers ("CPI-U") for the first half of 2020, and then to divide the resulting product by the reported CPI-U for 2016. *Ayala v. Cook Family Builders LLC*, 2018 WL 1631453, at \*5 (D. Or. Mar. 6, 2018), *report and recommendation adopted*, 2018 WL 1629863 (D. Or. Apr. 3, 2018). The CPI-U for the Western states in the first half of 2020 was 273.646. *See* U.S. Dep't of Labor, *Consumer Price Index*, [https://www.bls.gov/regions/west/news-release/consumerpriceindex\\_west.htm](https://www.bls.gov/regions/west/news-release/consumerpriceindex_west.htm). The annual CPI-U for the Western states in 2016 was 247.705. *Id.* Using the method described above, the adjusted average hourly billing rate for 2020 is \$405.43.

7. I am the attorney primarily responsible for this matter. I bill at a standard rate of \$415 per hour. I graduated from law school approximately 19 years ago and have been admitted to practice in Oregon for approximately 16 years.

8. Timothy Wright, who assisted on certain research projects in this matter, bills at a standard rate of \$285 per hour. Mr. Wright has been admitted to practice in Oregon for approximately two and a half years. Prior to joining Tonkon Torp, he served for two years as a judicial law clerk for the former Chief Judge at the Oregon Court of Appeals.

9. My rate and Mr. Wright's rate are fair and reasonable given our experience, knowledge, and recognized competence in the areas of law for which the services were rendered.

10. A total of 288 hours were spent on this case from January 1, 2020 through June 30, 2020, as follows: approximately (a) 109.9 hours relating to researching, investigating, and preparing numerous pretrial submissions based on the Court's orders and in response to Defendant's filings (b) 27.9 hours relating to investigating, researching, and preparing court papers based on the affirmative defenses originally asserted by Defendant and additional defenses belatedly asserted by Defendant; (c) 6.4 hours relating to preparing for and attending multiple status conferences, (d) 106.7 hours relating to preparing for trial two times because the first trial date was postponed five days prior to the start of trial at Defendant's request; (e) 24.5 hours relating to overseeing the logistics of and conducting a two-day trial via video conference; (f) 6.5 hours relating to preparing and communicating about the terms of the judgment; (g) 3.2 hours relating to researching registration of the judgment in California, where Defendant resides; and (h) 2.9 hours relating to case management and other work directly related to these proceedings. The hours spent on this matter are reasonable considering the number of

documents drafted, the issues researched, the time spent responding to Defendant's various pleadings, the number of status conferences held; and the time spent preparing for trial set for March of 2020 and, again, for June of 2020, because the March trial was rescheduled at Defendant's request only five days before the March trial was to commence. The time spent on this matter was necessary to reach an acceptable outcome for Plaintiff.

11. The only costs incurred from January 1, 2020 through June 30, 2020 were the costs of copying pleadings and exhibits (to provide notebooks to the court pursuant to court orders, to provide pleading and exhibit notebooks to me, and to have exhibit notebooks available to witnesses) and delivering those notebooks. These costs are for services that were actually and necessarily performed.

12. The time expended, services rendered, and overall fees and expenses charged are reasonable and necessary given the legal issues raised, the nature and scope of the matters raised by Defendant that Plaintiff had to address, and the positions taken by Defendant and the defenses asserted.

**PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS ARE TRUE AND CORRECT.**

DATED this 20th day of July, 2020.

By s/ Ava L. Schoen

037840/00005/11265710v2

**ADI ACQUISITION CO., LLC V. THEODORE L. VALLAS**  
**037840-00005**

<b>Work Date</b>	<b>Invoice Number</b>	<b>Narrative</b>	<b>WTK</b>	<b>Hours</b>	<b>Fees Billed</b>
1/2/2020	1598444	Prepare pretrial submissions (1.8); analyze and communicate regarding terms of stock purchase agreement (.4)	ALS	2.2	913.00
1/3/2020	1598444	Analyze and identify trial exhibits (2.8); research and draft trial memorandum (2.5)	ALS	5.3	2,199.50
1/6/2020	1598444	Research and draft trial memorandum (.4); analyze and identify trial exhibits (.7)	ALS	1.1	456.50
1/7/2020	1598444	Analyze defenses in defendant's answer	TW	1.1	313.50
1/7/2020	1598444	Review documents produced in case (1.1); analyze and identify trial exhibits (3.2)	ALS	4.3	1,784.50
1/8/2020	1598444	Review documents produced in case (.9); analyze and identify trial exhibits (1.1)	ALS	2.0	830.00
1/9/2020	1598444	Analyze arguments for motions in limine	TW	0.2	57.00
1/9/2020	1598444	Review documents produced in case (.6); analyze and identify trial exhibits (3.1)	ALS	3.7	1,535.50
1/10/2020	1598444	Analyze and identify trial exhibits (.6); research and draft trial memorandum (2.1)	ALS	2.7	1,120.50
1/13/2020	1598444	Analyze effect of waiver of defenses on defendant's answer and future arguments	TW	6.2	1,767.00
1/13/2020	1598444	Prepare timeline of events (.7); identify trial exhibits (.9); draft trial memorandum (1.2)	ALS	2.8	1,162.00
1/14/2020	1598444	Analyze and identify trial exhibits (1.4); research waiver of affirmative defenses (2.1)	ALS	3.5	1,452.50
1/14/2020	1598444	Analyze effect of waiver of defenses on defendant's answer and future arguments	TW	3.1	883.50

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1/15/2020	1598444	Analyze elements of defendant's affirmative defenses (3.2)	TW	3.2	912.00
1/15/2020	1598444	Conduct research of motions in limine to exclude evidence of defendant's affirmative defenses (.2)	ALS	0.2	83.00
1/16/2020	1598444	Prepare for trial against Mr. Vallas, including researching and drafting trial memorandum (.5) and preparing summary of economic damages (.3)	ALS	0.8	332.00
1/17/2020	1598444	Draft elements of defendant's affirmative defenses (2.4)	TW	2.4	684.00
1/17/2020	1598444	Prepare for and attend meeting with Mr. Canby to prepare for trial	ALS	2.9	1,203.50
1/20/2020	1598444	Research and draft trial memorandum (.7)	ALS	0.7	290.50
1/21/2020	1598444	Prepare for trial against Mr. Vallas, including researching and drafting trial memorandum (.5), preparing summary of economic damages (.2), and identifying rebuttal exhibits (1.3)	ALS	2.0	830.00
1/21/2020	1598444	Receive assignment and go over exhibit preparation for trial (.2)	AU	0.2	45.00
1/22/2020	1598444	Create initial exhibit list for attorney review (2.5)	AU	2.5	562.50
1/22/2020	1598444	Prepare summary of witness testimony (.5) and identify trial exhibits (.4)	ALS	0.9	373.50
1/23/2020	1598444	Begin to incorporate edits to exhibit list (.2)	AU	0.2	45.00
1/23/2020	1598444	Research and draft trial memorandum (.6); analyze needed witness testimony (1.1); identify rebuttal exhibits (.9)	ALS	2.6	1,079.00
1/24/2020	1598444	Edit exhibit list (1.8)	AU	1.6	360.00

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1/24/2020	1598444	Prepare summary of economic damages (.2) and statement of witness testimony (1.9); revise trial memorandum (.3)	ALS	2.4	996.00
1/25/2020	1598444	Refine exhibits (2.5); revise timeline of events (1.1); research and revise trial memorandum (2.9); revise summary of economic damages (.2)	ALS	6.7	2,780.50
1/26/2020	1598444	Refine exhibits (1.3); research and revise trial memorandum (1.6); revise summary of economic damages (.3); revise summaries of witness testimony (1.3)	ALS	4.5	1,867.50
1/27/2020	1598444	Analyze breach of guaranty issue for motion in limine (3.9)	TW	3.9	1,111.50
1/27/2020	1598444	Compile trial exhibits electronically and meet with attorney regarding next steps for trial exhibits (2.1)	AU	2.1	472.50
1/27/2020	1598444	Research and revise trial memorandum (.6); research and draft motions in limine to exclude defendant's evidence (2.5)	ALS	3.1	1,286.50
1/28/2020	1598444	Prepare trial exhibits and updated exhibit lists (4.0)	AU	4.0	900.00
1/28/2020	1598444	Refine exhibits (.6); revise trial memorandum (1.5), summary of economic damages (.1), and witness statements (1.1)	ALS	3.3	1,369.50
1/29/2020	1598444	Finalize trial exhibits and prepare them for submission to the court and parties (3.0)	AU	3.0	675.00
1/29/2020	1598444	Refine exhibits (.9); revise summary of economic damages, (.1) trial memorandum (.2), and witness statements (.2); communications with court regarding pretrial conference (.2)	ALS	1.6	664.00
1/30/2020	1598444	Prepare electronic trial exhibits for submission to court (.8)	AU	0.8	180.00

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1/30/2020	1598444	Update trial exhibits (.3); identify impeachment exhibits (1.4); analyze and communicate about Mr. Vallas' compliance with court deadlines and series of communications with Mr. Vallas, client, and court clerk regarding same (.8)	ALS	2.5	1,037.50
1/31/2020	1598444	Research and identify impeachment exhibits (.9); prepare for, appear at, and follow up to status conference regarding court deadlines (1.7); update pretrial submissions (.3)	ALS	2.9	1,203.50
1/31/2020	1598444	Finalize electronic trial exhibits for submission to the court (.7)	AU	0.7	157.50
1/31/2020	1598444	Prepare impeachment exhibits and update exhibit list (.5)	AU	0.5	112.50
2/2/2020	1599561	Update pretrial pleadings (.5)	ALS	0.5	207.50
2/3/2020	1599561	Finalize transmittal and delivery of judge's copies of plaintiff's trial exhibits and send electronic copies to Mr. Vallas (.8)	AU	0.8	180.00
2/3/2020	1599561	Finalize various pretrial pleadings (2.6); research and draft motions in limine (2.5)	ALS	5.1	2,116.50
2/3/2020	1599561	Process and save potential impeachment exhibits (.2)	AU	0.2	45.00
2/4/2020	1599561	Telephone conference with Mr. Vallas to confer regarding motions in limine (.1); continue to draft motions in limine (.3)	ALS	0.4	166.00
2/5/2020	1599561	Telephone conference with Mr. Vallas and follow up thereto (.3); conduct witness research (.6); identify impeachment exhibits (.3); revise motions in limine (.4)	ALS	1.6	664.00
2/5/2020	1599561	Update rebuttal exhibits and trial exhibit notebooks; process impeachment exhibits; process defendant's trial exhibits (1.0)	AU	1.0	225.00



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2/6/2020	1599561	Research background information with regard to potential impeachment exhibits and prepare summary (.4)	AU	0.4	90.00
2/6/2020	1599561	Review defendant's trial exhibits and compile for attorney review (1.3)	AU	1.3	292.50
2/6/2020	1599561	Revise motions in limine (1.1); review Mr. Vallas' exhibits (.9); research and prepare evidentiary objections to Mr. Vallas' exhibits (6.3)	ALS	8.3	3,444.50
2/7/2020	1599561	Finalize motions in limine (.3); research and prepare objections to Mr. Vallas' exhibits and witnesses (2.2); identify impeachment exhibits (2.3); draft rebuttal witness statements (.5)	ALS	5.3	2,199.50
2/7/2020	1599561	Prepare impeachment exhibits for delivery to court (2.3)	AU	2.3	517.50
2/10/2020	1599561	Send trial exhibits to Mr. Vallas per his request (.3)	AU	0.3	67.50
2/11/2020	1599561	Draft rebuttal witness statements (.2); draft findings of fact and conclusions of law (1.4)	ALS	1.6	664.00
2/12/2020	1599561	Draft findings of fact and conclusions of law (2.7); identify rebuttal exhibits (3.5)	ALS	6.2	2,573.00
2/12/2020	1599561	Electronically format final impeachment exhibits for trial; update draft rebuttal exhibits list and newly identified exhibits (1.2)	AU	1.2	270.00
2/13/2020	1599561	Research and draft findings of fact and conclusions of law (1.8)	ALS	1.6	664.00
2/14/2020	1599561	Prepare and submit plaintiff's rebuttal exhibits to court; process electronic versions of rebuttal exhibits for email service upon Mr. Vallas (3.8)	AU	3.8	855.00

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2/14/2020	1599561	Revise proposed findings of fact and conclusions of law (2.5); identify rebuttal exhibits (2.6); participate in status conference with court and follow up thereto (.7)	ALS	5.8	2,407.00
2/17/2020	1599561	Update fourth wave of pretrial documents due to court (1.8)	ALS	1.8	747.00
2/19/2020	1599561	Compare handwritten vs typed exhibit list and exhibits from Mr. Vallas on February 5 and 19, 2020; report to attorney that the sets are identical (.6)	AU	0.6	135.00
2/19/2020	1599561	Finalize plaintiff's trial exhibit notebooks (original & copies); review and compare for accuracy plaintiff's chart of objections to defendant's witnesses and exhibits and plaintiff's objections to defendant's witnesses and exhibits (1.0)	AU	1.0	225.00
2/19/2020	1599561	Telephone conference with Mr. Canby regarding trial preparation (.9); continue preparing pretrial submissions to court (3.8); analyze Mr. Vallas' objections to motions in limine (.4)	ALS	5.1	2,116.50
2/20/2020	1599561	Finalize six sets of trial exhibit notebooks	AU	0.3	67.50
2/20/2020	1599561	Telephone conference to confer with Mr. Vallas (.1); research and draft motion to strike defendant's purported economic damages (1.2); continue trial preparations (2.9)	ALS	4.2	1,743.00
2/21/2020	1599561	Make exhibit notebook for witness Mike Fletcher (.3)	AU	0.3	67.50

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2/21/2020	1599561	Telephone conference with Mr. Vallas and follow-up thereto (.4); series of settlement communications (.3); continue trial preparation (.1)	ALS	0.8	332.00
2/22/2020	1599561	Prepare witness outlines (.4)	ALS	0.4	166.00
2/24/2020	1599561	Prepare for, participate in status conference, and follow up thereto (.6); continue trial preparations with a focus on witness testimony (2.5)	ALS	3.1	1,286.50
2/25/2020	1599561	Review updated pleadings from court (.2)	AU	0.2	45.00
2/25/2020	1599561	Telephone conferences with Messrs. Vallas and Pineda regarding scheduling depositions (.4); continue preparing for trial with focus on witness testimony and use of exhibits (6.7)	ALS	7.1	2,946.50
2/26/2020	1599561	Series of communications regarding possible depositions (.8); continue preparing for trial with focus on witness testimony and use of exhibits (4.1)	ALS	4.9	2,033.50
2/27/2020	1599561	Prepare and transmit to court additional impeachment exhibit; assemble impeachment exhibits for use at trial	AU	1.7	382.50
2/27/2020	1599561	Series of communications regarding possible depositions (.5); continue preparing for trial with focus on witness testimony and use of exhibits (2.4)	ALS	2.9	1,203.50
2/28/2020	1599561	Continue preparing for trial with focus on witness testimony and use of exhibits (1.9); meeting with Mr. Fletcher to prepare his rebuttal testimony (1.3)	ALS	3.2	1,328.00
3/1/2020	1601080	Draft opening statement (.7); prepare witness outlines (1.4); identify additional rebuttal exhibits (.6)	ALS	2.7	1,120.50

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3/2/2020	1601080	Draft supplemental rebuttal exhibit list; prepare corresponding exhibits for court, notebooks, and service upon defendant (2.5)	AU	2.5	562.50
3/2/2020	1601080	Prepare supplemental rebuttal exhibit list (.3); research and draft motion to strike (3.6); confer with Mr. Vallas (.1); trial preparation communications (1.4)	ALS	5.4	2,241.00
3/3/2020	1601080	Conduct witness preparation of Mr. Canby (4.5); Series of communications regarding trial postponement (.8)	ALS	5.3	2,199.50
3/3/2020	1601080	Prepare additional rebuttal exhibits and cover letter to judge for delivery of judge's copies; update exhibit notebooks; and email service copies to Mr. Vallas (2.0)	AU	2.0	450.00
3/4/2020	1601080	Analyze options for proceeding with trial (.4)	ALS	0.4	166.00
3/4/2020	1601080	Update trial exhibit notebooks with current exhibits lists (.2)	AU	0.2	45.00
3/5/2020	1601080	Prepare for, participate in, and follow up to status conference regarding postponement of trial (1.2)	ALS	1.2	498.00
3/11/2020	1601080	Research Scott Robinson (.1)	ALS	0.1	41.50
3/16/2020	1601080	Communications regarding rescheduling trial (.1)	ALS	0.1	41.50
3/23/2020	1601080	Communications regarding rescheduling trial (.1)	ALS	0.1	41.50
5/11/2020	1605582	Communications regarding upcoming trial date (.1)	ALS	0.1	41.50
5/12/2020	1605582	Communications regarding status conference with court regarding trial date (.2)	ALS	0.2	83.00
5/14/2020	1605582	Analyze case status for possible trial preparation (.5)	AU	0.5	112.50

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5/14/2020	1605582	Prepare for, participate in, and follow-up to status conference with court regarding upcoming trial (.5), start arranging logistics of conducting trial via video conference (1.8)	ALS	2.3	954.50
5/15/2020	1605582	Research and communications regarding conducting trial by video conference (.8)	ALS	0.8	332.00
5/19/2020	1605582	Analyze trial preparation tasks (.8)	AU	0.6	135.00
5/19/2020	1605582	Appear at status conference and follow-up thereto as to trial logistics (1.5)	ALS	1.5	622.50
5/20/2020	1605582	Series of communications regarding trial preparations (.7) and logistics(.5)	ALS	1.2	498.00
5/20/2020	1605582	Trial preparation (2.3); research logistics for video conference trial (.9)	AU	3.2	720.00
5/21/2020	1605582	Trial preparation logistics (.1)	ALS	0.1	41.50
5/21/2020	1605582	Trial preparation logistics (.3)	AU	0.3	67.50
5/24/2020	1605582	Prepare trial exhibits for delivery to court (.8)	AU	0.6	135.00
5/24/2020	1605582	Trial preparation (4.5)	ALS	4.5	1,867.50
5/25/2020	1605582	Trial preparation (.8)	ALS	0.6	249.00
5/26/2020	1605582	Trial preparation logistics (.4)	AU	0.4	90.00
5/26/2020	1605582	Trial preparation logistics (.5)	ALS	0.5	207.50
5/27/2020	1605582	Trial preparation (1.6); oversee logistics for video conference trial (.9)	ALS	2.5	1,037.50
5/28/2020	1605582	Trial preparation (.1)	AU	0.1	22.50
5/28/2020	1605582	Trial preparation, and communications (1.4); oversee logistics of arranging for video conference trial (.8)	ALS	2.2	913.00
5/29/2020	1605582	Trial preparation (5.2) and communications regarding video conference trial (.7)	ALS	5.9	2,448.50

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5/29/2020	1605582	Update Exhibit 29 and draft email correspondence enclosing impeachment exhibits (1.0)	AU	1	225.00
6/1/2020	1607000	Trial preparation (2.3); research logistics for Zoom trial (1.0)	ALS	3.3	1,369.50
6/1/2020	1607000	Trial preparation (1.3)	AU	1.3	292.50
6/2/2020	1607000	Trial and witness preparation (2.9)	ALS	2.9	1,203.50
6/2/2020	1607000	Trial preparation (our Exhibit 28) (.2)	AU	0.2	45.00
6/3/2020	1607000	Trial and witness preparation (1.8)	ALS	1.8	747.00
6/3/2020	1607000	Trial preparation: update Exhibit 28 and email draft to attorney for review (.5)	AU	0.5	112.50
6/4/2020	1607000	Trial and witness preparation (3.6); series of communications regarding trial logistics and technology (.5)	ALS	4.1	1,701.50
6/4/2020	1607000	Trial preparation (1.2)	AU	1.2	270.00
6/5/2020	1607000	Trial preparation (1.3)	ALS	1.3	539.50
6/7/2020	1607000	Trial preparation (2.3)	ALS	2.3	954.50
6/8/2020	1607000	Trial and witness preparation (4.5)	ALS	4.5	1,867.50
6/9/2020	1607000	Prepare for trial (4.8)	ALS	4.8	1,992.00
6/10/2020	1607000	Prepare for and conduct trial (8.8)	ALS	8.8	3,652.00
6/11/2020	1607000	Prepare for and conduct trial (8.5)	ALS	6.5	2,697.50
6/17/2020	1607000	Research registering Oregon district court judgment in California (.2); review findings of fact and conclusions of law (.2)	ALS	0.4	166.00
6/17/2020	1607000	Review email correspondence and findings of fact and conclusions of law issued by Judge Hernandez (.2)	AU	0.2	45.00

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6/19/2020	1607000	Research and draft judgment and communicate regarding same (1.2); research and draft fee petition (1.5)	ALS	2.7	1,120.50
6/22/2020	1607000	Research fee petition (.3)	ALS	0.3	124.50
6/23/2020	1607000	Analyze judgment registration process in California (1.4)	TW	1.4	399.00
6/23/2020	1607000	Research and draft fee petition (2.0)	ALS	2.0	830.00
6/25/2020	1607000	Series of communications regarding terms of judgment (.4)	ALS	0.4	166.00
6/29/2020	1607000	Series of communications regarding terms of judgment (.4)	ALS	0.4	166.00
6/30/2020	1607000	Analyze judgment registration process for California (1.1)	TW	1.1	313.50
6/30/2020	1607000	Revise judgment and communicate with Mr. Vallas regarding same (.3); research recording and enforcing judgment in California (.5)	ALS	0.8	332.00
			<b>Sum:</b>	<b>288</b>	<b>\$107,880.00</b>

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**ADI Acquisition Co., LLC****037840-00005**

<b>Date</b>	<b>Invoice</b>	<b>Description</b>	<b>Billable</b>
01/03/20	1598444	Color Copy (in-house)	974.00
01/03/20	1598444	Photocopy (in-house)	48.25
01/29/20	1598444	Color Copy (in-house)	156.50
01/29/20	1598444	Photocopy (in-house)	108.00
02/03/20	1599561	Photocopy (in-house)	0.35
02/12/20	1605582	Telephone - Pacer Service Center	5.20
02/14/20	1599561	Color Copy (in-house)	52.50
02/14/20	1599561	Photocopy (in-house)	0.10
02/19/20	1599561	Color Copy (in-house)	392.50
02/19/20	1599561	Photocopy (in-house)	36.15
02/25/20	1599561	Color Copy (in-house)	315.50
02/25/20	1599561	Photocopy (in-house)	0.75
02/27/20	1599561	Photocopy (in-house)	0.45
03/02/20	1601080	Color Copy (in-house)	27.50
03/02/20	1601080	Photocopy (in-house)	3.90
03/03/20	1601080	Color Copy (in-house)	3.50
03/03/20	1601080	Photocopy (in-house)	0.35
05/21/20	1605582	Local Messenger/Delivery - MercuryPDX LLC TO: John Beardsley	15.00
05/26/20	1605582	Local Messenger/Delivery - MercuryPDX LLC TO: USDC	8.00
			<b>2,148.50</b>



**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **DECLARATION OF AVA L. SCHOEN IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEYS' FEES** on:

Theodore L. Vallas  
Carlsbad-Palomar Airlines, Inc.  
2100 Palomar Airport Road, #222/223  
Carlsbad, CA 92011  
[Vallas1@cox.net](mailto:Vallas1@cox.net)  
[tgallas@gmail.com](mailto:tgallas@gmail.com)

by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to said party's last-known address and depositing in the U.S. mail at Portland, Oregon on the date set forth below; and by causing a copy thereof to be emailed to said party at said party's last-known email addresses on the date set forth below.

DATED this 20th day of July, 2020.

TONKON TORP LLP

By s/ Ava L. Schoen

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